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Attorney for Defendant
NATASHA RENEE CHALK

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 1:21-CR-00024-JLT-SKO
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	SENTENCING DATE; ORDER
)	
NATASHA RENEE CHALK)	DATE: September 25, 2023
)	TIME: 10:00 a.m.
)	COURT: Hon. Jennifer L. Thurston
Defendant.)	

Counsel for Defendant Natasha Renee Chalk, by and through her counsel of record, Assistant Federal Defender Meghan D. McLoughlin, and Plaintiff United States of America, by and through its counsel of record, Assistant United States Attorney Joseph D. Barton, hereby stipulate as follows:

1. By previous order, this case was set for sentencing on September 25, 2023.
2. By this stipulation, defendant now moves to continue the sentencing hearing until November 20, 2023. As this is a sentencing and a change of plea and admission have already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Defense counsel, Ms. Chalk, and United States Probation have been working to schedule a presentence interview in order to complete the presentence investigation report for the scheduled sentencing date, based on their schedules and

locations outside of Fresno County. At this point, they have scheduled a date and time, but United States Probation will need additional time to complete the report thereafter.

b) In addition, Defense counsel has been compiling mitigation documents relevant to sentencing, including educational and medical records of Ms. Chalk's parents and children. Counsel is still waiting to receive some of these documents in order to make a thorough and complete sentencing presentation.

c) Defense counsel believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Dated: July 20, 2023

/s/ Meghan D. McLoughlin
MEGHAN MCLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
NATASHA RENEE CHALK

Dated: July 20, 2023

/s/ Joseph D. Barton
JOSEPH D. BARTON
Assistant United States Attorney

FINDINGS AND ORDER

IT IS SO FOUND.

IT IS SO ORDERED.

Dated: **July 20, 2023**


UNITED STATES DISTRICT JUDGE